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From: Langman, Michael
Sent: Wed 9/21/2016 3:35:25 PM
Subject: Follow-up to 9/21 call - Tradebe's CAA permit and response to ETC's comments

Hi all,

Sorry I dropped the call early, I had another call scheduled immediately following. As requested, I am resending my email from last week which includes a link to Tradebe's CAA Title V operating permit. Please let me know if I've included everybody on the call or if somebody else would be interested in the CAA permit as well.

I should clarify that ETC submitted a comment stating that the TDUs at Tradebe should be subject to 40 CFR 63 Subpart EEE, the hazardous waste combustor (HWC) MACT at 40 CFR 63.1200. IDEM's response states that the HWC MACT doesn't apply because the TDUs are not hazardous waste combustors. IDEM's response also provides its position regarding TD*X and Rineco.

ETC's comment and IDEM's response can be found beginning on pdf page 406 of the document linked below. Other relevant pages are also included below.

Thanks,
 Michael Langman
 Environmental Scientist
 Air Permits Section, US EPA Region 5
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From: Langman, Michael
Sent: Wednesday, September 14, 2016 11:08 AM
To: Gerhard, Sasha <Gerhard.Sasha@epa.gov>; Atagi, Tracy <Atagi.Tracy@epa.gov>; Galbraith, Michael <Galbraith.Michael@epa.gov>; Colon, Lilybeth <Colon.Lilybeth@epa.gov>; Behan, Frank <Behan.Frank@epa.gov>; Elliott, Ross <Elliott.Ross@epa.gov>; Victorine, Gary <victorine.gary@epa.gov>; Lee, Jae <lee.jae@epa.gov>
Cc: Setnicar, Mary <setnicar.mary@epa.gov>; Cunningham, Michael <cunningham.michael@epa.gov>
Subject: Tradebe's CAA Title V operating permit

Hi all,

Tradebe's CAA Title V operating permit can be found at <http://permits.air.idem.in.gov/34432f.pdf>. Relevant to the discussion here is ETC's comment about 40 CFR 63 Subpart EEE's applicability to Tradebe's thermal desorption units (TDUs) and IDEM's response. IDEM's response to comments can be found in the addendum to the technical support document (ATSD), which can be found beginning on pdf page 398. Here's where you can find certain documents in the linked pdf:

- ATSD Page 9-11 (pdf page 406-408): Summary of ETC's comment and IDEM's response, citing two RCRA documents:
 - RCRA Online Number 14266
 - RCRA Online Number 13657
- ATSD Appendix A (pdf page 409-502): ETC's full comment with supporting attachments
 - PDF page 410-413: ETC's full comments
 - PDF Page 414-443: Attachment - Rineco decision
 - PDF page 444-448: Attachment - Tradebe's brochure about the TDUs
 - PDF page 449-502: Attachment - TD*X CAFO from Region 6
- ATSD Appendix B (pdf page 503-504): IDEM's July 18, 2002 determination that the TDUs meet the recycling process exclusion pursuant to 40 CFR 261.6(c)(1)
- ATSD Appendix C (pdf page 505-508): IDEM's March 31, 2006 letter to ETC regarding legitimate recycling of hazardous waste for the TDU

ETC's petition to object to Tradebe's Title V operating permit can be found at https://www.epa.gov/sites/production/files/2015-08/documents/tradebe_petition2015.pdf.

Please let me know if you can't access any of the linked documents.

Thanks,
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